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Sent Via NJ Lawyer's Service

Clerk
United States Bankruptcy Court
King Federal Building
50 Walnut Street – 3rd Floor
Newark, NJ 07102

Re: In Re Bawer Aksal; Case No. 17-12555-JKS

Your Honor

2011 NAR 12 P 3: 03

EAST DEPUTY CLERK

March 1, 2017

Please be advised that this office serves as counsel to the Rivoli Court Condominium Association, Inc. (the "Association"). The purpose of this communication is to serve as a response to Bawer Aksal's ("Debtor") motion to redeem real property located at 325 79th Street, Unit 51, North Bergen, NJ 07047 (the "Unit").

In this case, on February 10, 2017, two (2) days prior to the expiration of the ten-day redemption period, Debtor filed a Chapter 13 bankruptcy petition ("Petition). The Association takes no issue with the sixty (60) day extension of the redemption period, to April 13, 2017. However, I would like to bring to the Court's attention that although Debtor's counsel notes in his certification that the Hudson County Sheriff's Office ("HCSO") was contacted regarding this bankruptcy (See Fitzgerald Cert., Para 3), HCSO did in fact issue a sheriff's deed. Same was received yesterday, February 28, 2017, and I do have same in my possession. Had I known that the HCSO was unaware of the filing of Debtor's Petition, I would have contacted HCSO myself (or perhaps HCSO was aware, and the deed was issued in error).

In any event, I have no problem holding the deed in escrow pending Debtor's redemption; however, I would respectfully request that the Order provide that in the event Debtor fails to redeem the Unit by April 13, 2017, the foreclosure sale is automatically validated, and the Association may record the sheriff's deed.

I thank Your Honor for your attention to this matter.

Very truly yours,

Brian M. Rader, Esquire

Cc: Nicholas Fitzgerald, Esq.